

IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WESTFIELD INSURANCE COMPANY,)
)
Plaintiff,) C.A. No. 08-56
)
)
v.)
)
CHIP SLAUGHTER AUTO WHOLESALE,)
INC.; PAUL SLAUGHTER; LEE F.)
SLAUGHTER, JR.; DANIEL FEELEY,)
by his Guardian Ad Litem KELLY)
BLAIR, LAUREN DIEHL; and COLIN)
SANDLER,)
Defendants,)
)
v.)
)
CHIP SLAUGHTER AUTO WHOLESALE,)
INC.; PAUL SLAUGHTER; LEE F.)
SLAUGHTER, JR.; DANIEL FEELEY,)
by his Guardian Ad Litem KELLY)
BLAIR, LAUREN DIEHL; and COLIN)
SANDLER,)
Third-Party Plaintiffs,)
)
v.)
)
PFISTER INSURANCE INC.)
Third-Party Defendant.)

RE-NOTICE OF RULE 30(b)(6) DEPOSITION OF PLAINTIFF
WESTFIELD INSURANCE COMPANY

TO: James S. Yoder, Esquire
White and Williams, LLP
824 N. Market Street,
Suite 902
P.O. Box 709
Wilmington, DE 19899

Stephen P. Casarino, Esquire
Casarino, Christman & Shalk
800 North King Street
Suite 200
P.O. Box 1276
Wilmington, DE 19899

Benjamin A. Schwartz
Schwartz & Schwartz
1140 South State Street
Dover, DE 19901

PLEASE TAKE NOTICE that the deposition noticed pursuant to Superior Court Rule 30(b)(6) of the following individual or individuals to be produced by Plaintiff Westfield Insurance Company ("Westfield") will be taken at 10:00 a.m. on Thursday, November 13, 2008, at the law office of White and Williams, 824 N. Market Street, Suite 902, Wilmington, Delaware 19899.

One or more persons designated pursuant to Rule 30(b)(6)¹ who consents to testify on behalf of Plaintiff Westfield Insurance Company, as to all matters known or reasonably available to Westfield Insurance Company, regarding the following matters:

(1) Westfield's contentions regarding the facts and matters alleged in the Answer, Counterclaim, Third-Party Complaint, Answer to Counter claim and Answer to Third-Party Complaint;

(2) All information contained in Plaintiff Westfield's claims and coverage files for this accident/claim.

(3) Plaintiff Westfield's contentions regarding any reasons for denying coverage under the claim at issue.

(4) All facts relevant in any way to Plaintiff Westfield's denial of coverage for the claim at issue in this action.

(5) All facts and information related in any way to ownership of the vehicle driven by Paul Slaughter on the day and time of the accident.

(6) All information provided in Plaintiff Westfield's Initial Disclosures;

(7) The factual basis for all defenses and assertions you have pled in this litigation;

(8) The persons and employees of Plaintiff Westfield who have knowledge regarding the items alleged in the pleadings, the extent of their knowledge, and their current employment, addresses, and telephone numbers;

(9) All information regarding any other person, entity, or party that may be potentially responsible for providing insurance coverage on the day and time of the accident.

¹Plaintiff Counsel is hereby requested to provide, by October 8, 2008, the names and positions of the representative or representatives which will testify regarding all items known or reasonably available to the Plaintiff's corporation regarding the listed items.

(10) All information regarding insurance policies which may be applicable to the incident alleged in the Complaint, including but not limited to any policies covering Defendants and Third-Party Plaintiffs Chip Slaughter Auto Wholesale, Inc., Paul Slaughter, Lee F. Slaughter, Jr., Daniel Feeley and Lauren Diehl.

SCHMITTINGER AND RODRIGUEZ, P.A.

BY: 

NICHOLAS H. RODRIGUEZ, ESQUIRE
Delaware Bar I.D. #356
414 South State Street
P.O. Box 497
Dover, Delaware 19903-0497
(302) 674-0140
Attorney for Defendant/
Third-Party Plaintiff
Lauren Diehl

DATED: 9/4/08

SCHMITTINGER AND RODRIGUEZ, P.A.

BY: 

JEFFREY J. CLARK, ESQUIRE
Delaware Bar I.D. #3485
414 South State Street
P.O. Box 497
Dover, Delaware 19903-0497
(302) 674-0140
Attorney for Defendant/
Third-Party Plaintiff
Daniel Feeley

DATED: 9/4/08

CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of the following:

RE-NOTICE OF RULE 30(b)(6) DEPOSITION OF PLAINTIFF
WESTFIELD INSURANCE COMPANY

to be served upon:

James S. Yoder, Esquire
White and Williams, LLP
824 N. Market Street,
Suite 902
P.O. Box 709
Wilmington, DE 19899

Stephen P. Casarino, Esquire
Casarino, Christman & Shalk
800 North King Street
Suite 200
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Wilmington, DE 19899

Benjamin A. Schwartz
Schwartz & Schwartz
1140 South State Street
Dover, DE 19901

by e-filing and first-class mail to the addresses listed above on
9/4, 2008.

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414 South State Street
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